

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

JANE DOES 1-6, JOHN DOES 1-3
JACK DOES 1-1000, JOAN DOES 1-1000

Plaintiffs,

v.

Civil Action No.: 1:21-CV-00242-JDL

JANET T. MILLS, in her official capacity
As Governor of the State of Maine,
JEANNE M. LAMBREW, in her official
Capacity as Commissioner of the Maine
Department of Health and Human Services,
NIRAV D. SHAH, in his official capacity
as Director of the Maine Center for Disease
Control and Prevention,
MAINEHEALTH,
GENESIS HEALTHCARE OF MAINE, LLC,
GENESIS HEALTHCARE, LLC,
NORTHERN LIGHT HEALTH
FOUNDATION, and
MAINEGENERAL HEALTH.

Defendants.

DEFENDANT NORTHERN LIGHT HEALTH FOUNDATION'S OMNIBUS RESPONSE TO
PENDING MOTIONS

NOW COMES, Defendant Northern Light Health Foundation, by and through the undersigned counsel, and files its Omnibus Response to the Pending Motions in this matter as follows:

1. As to Plaintiffs' Motion to Stay Pending Disposition of Petition for Writ of *Certiorari* in United States Supreme Court, Defendant Northern Light Health Foundation takes no position.

2. As to the News Media Motion to Intervene, as undersigned counsel for Defendant Northern Light Health Foundation reported at the recent Case Management Conference, Defendant Northern Light Health Foundation takes no position.

However, at the Case Management Conference, Plaintiffs indicated that if the Court grants the intervention and relief requested in said motion, Plaintiffs would appeal. Defendant Northern Light Health Foundation reserves the right to make any and all appropriate procedural arguments concerning the propriety of such an appeal, including, but not limited to, whether such an appeal is cognizable at this juncture.

Dated at Augusta, Maine, this 3rd day of December, 2021.

NORTHERN LIGHT HEALTH FOUNDATION

By /s/ Ryan P. Dumais
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Northern Light Health Foundation*

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, I electronically filed the foregoing Omnibus Response to Pending Motions with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Ryan P. Dumais

Ryan P. Dumais, Esq.